

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATE BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Emergent Fidelity Technologies, Ltd.,

Debtor.<sup>1</sup>

Chapter 11

Case No. 23-10149 (JTD)

Re: D.I. \_\_\_\_\_

**ORDER STRIKING (I) FTX DEBTORS' OPPOSITION TO BLOCKFI'S  
MOTION TO DISMISS AND (II) JOINDER OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS OF THE FTX DEBTORS  
TO THE FTX DEBTORS' OPPOSITION TO BLOCKFI'S MOTION FOR  
ENTRY OF AN ORDER DISMISSING THE DEBTOR'S CHAPTER 11  
CASE**

Upon the motion ("Motion")<sup>2</sup> of BlockFi Inc. ("BlockFi Inc."), BlockFi Lending LLC ("BlockFi Lending"), and BlockFi International LLC ("BlockFi International," together with BlockFi Inc. and BlockFi Lending, "BlockFi") for entry of an order (this "Order") striking (i) *FTX Debtors' Opposition to BlockFi's Motion to Dismiss* [D.I. 41] (the "FTX Objection") and the (ii) *Joinder of the Official Committee of Unsecured Creditors of the FTX Debtors to the FTX Debtors' Opposition to BlockFi's Motion for Entry of an Order Dismissing the Debtor's Chapter 11 Case* [D.I. 50] (the "UCC Joinder"); and this Court, having held a hearing to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings before this Court; and the Court having found and determined the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore:

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<sup>1</sup> The Debtor in this Chapter 11 case is Emergent Fidelity Technologies Ltd., a company formed under the laws of Antigua and Barbuda with registration number 17532 as identified by the Antigua and Barbuda Financial Services Regulatory Commission. The Debtor's principal place of business is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not defined herein are defined in the Motion.

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The FTX Objection is hereby stricken from the record and will not be considered for any purpose.
3. The UCC Joinder is hereby stricken from the record and will not be considered for any purpose.